
From: Jain, Abhishek [/O=CORPNYCHHC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A376F1B31674454886BB9716A102CC34-JAIN, ABHISHE]
Sent: 5/31/2019 4:04:06 PM
To: Winkler, Barry [barry.winkler@nychhc.org]; Kaye, Melissa [melissa.kaye@nychhc.org]; Mundy, Daniel [daniel.mundy@nychhc.org]; Owen, Elizabeth [elizabeth.owen@nychhc.org]
Subject: FW: New Interdisciplinary and Revised Nursing Policies
Attachments: INT 50 Unauthorized Recordings_053019.pdf

Hi everyone,

Please see attached policy and distribute to appropriate staff.

Thank you,

Beesh

-----Original Message-----

From: Ford, Elizabeth
Sent: Thursday, May 30, 2019 3:50 PM
To: Giftos, Jonathan <giftosj@nychhc.org>; Jain, Abhishek <jaina7@nychhc.org>; Barber Rioja, Virginia <barberv@nychhc.org>; Subedi, Bipin <Bipin.Subedi@nychhc.org>; Novak, Diana <NOVAKD@nychhc.org>; Solimo, Angela <asolimo@nychhc.org>
Subject: Fw: New Interdisciplinary and Revised Nursing Policies

See attached policy and distribute as appropriate.
Thanks

From: Axelrod, George
Sent: Thursday, May 30, 2019 3:42 PM
To: Macdonald, Ross; Ford, Elizabeth; Rosner, Zachary; CINTRON, LUIS; HAYDEN, THOMAS; Petrocelli, Danielle; Arias, Nancy; Raspanti, Colette; BOWEN, TANISHA; BUTRON, CONSUELO; Morgese, Patricia; Calandria, Roderick; Ornati, Susan; Jaffer, Mohamed; BACCHUS, MOHAMED; Flaherty, Cecilia; Fludd, Avlyn; Barber Rioja, Virginia; Giftos, Jonathan; WANGEL, JONATHAN; Laboy, Jessica; Jordan, Alison; Subedi, Bipin; Grigg, James; Herrera, Jeffrey; HARRIS, AMANDA; CASTELLANOS, CARLOS; Soto, Wilma; Martelle, Michelle; Bedard, Rachel; Farber, Benjamin (bfarber1); Jasmin, Alixzondra; Mcvey, Brendan
Cc: Yang, Patricia
Subject: New Interdisciplinary and Revised Nursing Policies

Greetings.

Attached is the following new Interdisciplinary policy:

INT 50 -- Unauthorized Recordings.

Also attached is the following revised Nursing policy:

NSG 23 -- Emergency Equipment and Supplies Check.

Please distribute the policies to all appropriate staff. They are also available in their respective policy manuals at the CHS POLICIES site on the S-drive.

Thank you.

SUBJECT: UNAUTHORIZED RECORDINGS

POLICY #: INT 50

POLICY:

NYC Health + Hospitals Correctional Health Services (CHS) prohibits staff from engaging in the unauthorized or secret recording of confidential, proprietary or personal information and personal images or voices belonging to CHS and/or its employees, affiliates, or patients. Staff may not record conversations of another without his or her prior knowledge and consent. Recordings include audio and/or video, by any means including smart phones.

PURPOSE:

1. To ensure the protection of confidential, proprietary information from unauthorized disclosure while also avoiding deceptive practices that do not promote honest, ethical standards of conduct.
2. To reduce or eliminate the potential for issues such as invasion of privacy (employee and patient) and sexual or other harassment (as defined by the H+H/CHS harassment policy).

DEFINITIONS:

1. For the purpose of this policy, "staff" shall be defined as any individual working directly or indirectly with CHS and employed by Health + Hospitals Correctional Health Services, Physicians Affiliate Group of New York, P.C. (PAGNY), Correctional Dental Associates, P.C. (CDA), Urgicare, P.C., any other affiliate, contractor or vendor of CHS, residents, students, volunteers, as well as any other individual or entity associated with CHS.
2. For the purposed of this policy, "unauthorized" means any purpose not approved by an employee's department head.
3. For the purposes of this policy, "recording" means the use of any device, whether digital or analog, to capture images or voices, regardless of whether in person, by telephone or by other means, such as videoconferencing, screen shots, click-to-chat or written communications.

PROCEDURE:

1. Consent Required for Audio Recording: While some states permit audio recording by one party to a conversation, this policy prohibits such recordings without the consent of all parties to the conversation, regardless of the location of each party. If a participant at a meeting or conference speaks directly into or at a recording device (such as a microphone or video camera) or a recording light is activated, then CHS considers that participant had notice of the recording and consented to


SUBJECT: UNAUTHORIZED RECORDINGS**POLICY #: INT 50**

it. In situations where it may not be obvious or apparent to participants that the meeting is being recorded (such as, no recording light exists or participation is by telephone), then the facilitator should notify all participants when they join the meeting that it will be recorded.

2. Recorded Lines. In certain situations, a recorded line device may be used to monitor or record telephone calls. Under these circumstances, CHS must notify employees and callers in advance that this type of monitoring may occur, either by use of an audible beep at periodic intervals during the telephone call or advance audio or written notice.
3. Clinical Settings. No Recordings shall be made in the clinics without the prior, written permission of the department head.
4. Violation of this policy may result in administrative and/or disciplinary action taken, up to and including termination.
5. In addition to the recording prohibition described above, all staff are also subject to and should be guided by the H+H Information Technology Resources Acceptable Use Policy.

EXCEPTION:

Nothing in this policy is intended to prevent CHS employees from making recordings for concerted activity purposes or as otherwise protected by law. An exception exists when employees engage in protected concerted activities under the National Labor Relations Act including, for example, taking pictures of health, safety, and/or working condition concerns or of strike, protest and work-related issues and/or other protected concerted activities.

Approved by: _____	Original Issue Date	Date(s) Revised
 Jonathan Wangel, Esq. Senior Director, Risk Mitigation & Management Correctional Health Services	May 30, 2019	